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January 10, 2002

Ex Parte

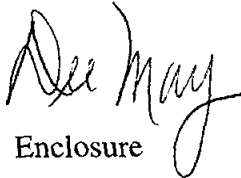
Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

Re: Bell Atlantic Corp. and GTE Corp., CC Docket No. 98-184

Dear Ms. Salas:

In response to requests from the Common Carrier Bureau, Verizon is providing the enclosed. Please let me know if you have any questions.

Sincerely,


Enclosure

cc: T. Dale
C. Matthey
M. Stone
D. Attwood

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January 10, 2002

Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW- Room 5C-450
Washington, D.C. 20554

Re: Merger Condition for Carrier-Carrier Performance Assurance Plan

Dear Ms. Attwood:

I am writing to request your approval to suspend temporarily the reporting of performance data and other quality data for the fGTE service areas in Virginia and Pennsylvania, as required under conditions 5 and 19 of the Merger Order. Verizon would continue to report performance data and other quality data for the fBA service areas in Virginia and Pennsylvania. I request this temporary suspension for the three month period of March to May, 2002 for Virginia and March to May, 2003 for Pennsylvania. It is during these respective three-month transition periods that Verizon will implement OSS uniformity as required under condition 6¹. During these respective transition periods, Verizon will transfer Company and customer records from the fGTE systems to the fBA systems, making reporting of data imprecise and extraordinarily complex. The allowance of the requested suspensions will help Verizon achieve an orderly transition from the reporting of these data for these two states under the business rules specified for the fGTE service areas to the business rules specified for the fBA service areas, and avoid reporting potentially garbled or misleading data resulting from the transition period².

Furthermore, Verizon does not request any suspension of its obligation to make payments under the Merger performance plan. Instead, Verizon proposes that the performance for the three months preceding the temporary suspension be used to calculate any payments that would be due during the suspension period. Verizon believes that this substitute payment calculation will avoid any credible claim that Verizon is avoiding its obligations under the merger conditions. Once the transition is complete, the use of transitioned business rules and systems would begin immediately, phasing in the new data over three months. Attachment A provides further details of Verizon's proposal.

¹ Within 5 years after the Merger Closing Date, Bell Atlantic/GTE will implement uniform, electronic OSS interfaces and business rules (including for pre-ordering and ordering components used to provide digital subscriber line ("xDSL") and other Advanced Services) between the Bell Atlantic and GTE Service Areas in Pennsylvania and Virginia. (CC Docket No. 98-184, Conditions for Bell Atlantic/GTE Merger, Condition VI, paragraph 19(f)).

² Ibid.

There will be no harm to the market or CLECs if Verizon's request is granted. The fGTE service areas of Virginia and Pennsylvania represent only 15.50% and 9.86% of the lines in those states served by Verizon. The performance data and other service quality data for the remaining portions of the states will continue to be reported and is expected to be unaffected by the transition.³ Performance data over the last 17 months for those fGTE service areas demonstrate Verizon has consistently provided excellent service. During the period of 2001, only one voluntary payment in the amount of \$2489.00 has been required as a result of the wholesale performance plan specified in the merger order for performance in for the fGTE service area of Pennsylvania. Verizon made no payments with respect to the fGTE service territory in Virginia. In addition, there are only 33 CLECs with approximately 27,171 lines in service in those fGTE Virginia and Pennsylvania service areas.

This temporary suspension will allow Verizon to make an orderly transition from the reporting of these data under the current business rules to the new business rules required by the Merger Order. Because the number of metrics and the types of metrics reported differ between the fGTE service areas and fBA service areas, there will be a necessary difference before and after the transition to the new uniform OSS. Additionally, transactions in a given central office, initiated prior to conversion may be completed in a different suite of systems and therefore the calculated results would be misleading and incomplete during the transition. The temporary suspension eliminates the mis-matches between different metrics from different systems that would make the meaningful quantification of any payment obligations difficult, if not impossible.

Verizon will begin its transition during March 2002 for the fGTE Virginia access lines and therefore request expeditious handling of this request.

Please do not hesitate to call me if you have any questions.

Sincerely,



Attachments

cc: Carol Matthey
Tony Dale
Mark Stone

³

f approval for this suspension is granted, Verizon intends to exclude all performance data relating to the fGTE service territory in Virginia and Pennsylvania during the suspension period. In some cases, such as pre-order transactions, exclusion may be difficult. Verizon proposes to include any such items as part of the fBA results.

Verizon
FGTE Virginia and Pennsylvania* Areas
Transition Payment Obligations Schedule for Condition 5

Payment Due Date	Data Months and Business Rules	Recommended Data Months and Business Rules
April 25, 2002	12/01-fGTE 01/02-fGTE 02/02-fGTE	No Change
May 25, 2002	01/01-fGTE 02/02-fGTE 03/02-?	12/01-fGTE 01/02-fGTE 02/02-fGTE
June 25, 2002	02/02-fGTE 03/02-? 04/02-?	12/01-fGTE 01/02-fGTE 02/02-fGTE
July 25, 2002	03/02-? 04/02-? 05/02-?	12/01-fGTE 01/02-fGTE 02/02-fGTE
August 25, 2002	04/02-? 05/02-? 06/02-fBA	06/02-fBA 06/02-fBA 06/02-fBA
September 25, 2002	05/02-? 06/02-fBA 07/02-fBA	06/02-fBA 06/02-fBA 07/02-fBA
October 25, 2002	06/02-fBA 07/02-fBA 08/02-fBA	No Change

* Note: These dates are for the Virginia transition. The dates for Pennsylvania transition would be 2003 and fall during the same months and timeframes.